

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**v.**

**Case No. 21-CR-00102-CVE**

**RENEE LYNN HAYNES,**

**Defendant.**

**Petition for Writ of Habeas Corpus Ad Prosequendum For Cause**

COMES NOW Thomas E. Duncombe, Assistant United States Attorney for the Northern District of Oklahoma, and represents to this Honorable Court that there is now pending in this Court a certain cause of action wherein the United States of America is plaintiff and in which RENEE LYNN HAYNES is defendant, and that the same is set for initial appearance at Tulsa, Oklahoma.

Plaintiff further states that it is necessary to have RENEE LYNN HAYNES present at Tulsa, Oklahoma, for initial appearance, forthwith, and for the duration of the above-styled matter.

That RENEE LYNN HAYNES at this time is a prisoner in the Ottawa County Jail, Miami, OK and will not have been released on the date that the initial appearance is scheduled, and that RENEE LYNN HAYNES is in the charge, custody, and under the control of the Sheriff of Ottawa County Jail, Miami, OK.

WHEREFORE, plaintiff prays that a Writ of Habeas Corpus Ad Prosequendum for Cause be issued by this Honorable Court to the Sheriff of said institution, and that he be directed and required to deliver the body of RENEE LYNN HAYNES to the United States Marshal for the Northern District of Oklahoma, or a Deputy Marshal, or to any federal law enforcement agent, and that the Marshal, deputy, or agent shall produce and bring the body of RENEE LYNN HAYNES before this Court in Tulsa, Oklahoma, forthwith, and that upon completion of the above-styled matter, the Marshal, deputy, or agent shall return the body of RENEE LYNN HAYNES to the aforesaid Ottawa County Jail, Miami, OK.

Respectfully submitted,

CLINTON J. JOHNSON  
Acting United States Attorney

/s/ Thomas E. Duncombe  
Thomas E. Duncombe, DC No. 1029476  
Assistant United States Attorney  
110 West 7th Street, Suite 300  
Tulsa, Oklahoma 74119  
(918) 382-2700

STATE OF OKLAHOMA       )  
  ) ss.  
COUNTY OF TULSA        )

Thomas E. Duncombe, Assistant United States Attorney for the Northern District of Oklahoma, being first duly sworn, and having read the above and foregoing Petition for Writ of Habeas Corpus Ad Prosequendum for Cause, states that the facts contained therein are true and correct to the best of my knowledge and belief.

/s/ Thomas E. Duncombe  
Assistant United States Attorney

Subscribed and sworn to before me this 25<sup>th</sup> day of June, 2021.

/s/ Tabatha Jean Berka  
Notary Public

My commission expires:

05/08/2021  
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